

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAVIS WASHBURN,

Defendant.

Case No. 18-MJ-3457

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

Tavis Washburn, through counsel, Assistant Federal Public Defender Alejandro Fernandez, respectfully moves this Court to allow him to attend the birth of his child in Farmington, NM.

1. On November 13, 2017, a preliminary hearing took place in this matter in which it was determined that there was probable cause to find that Mr. Washburn violated 18 U.S.C. § 1112 for the involuntary manslaughter of his brother as his brother rode as Mr. Washburn's passenger in a car that he operated while drunk. This Court released Mr. Washburn to La Pasada halfway house under an Order setting conditions of release. (Doc. 8).

2. Among his conditions of release is that Mr. Washburn restrict his travel to Bernalillo County "unless prior approval is obtained by supervising officer."

3. Mr. Washburn seeks to travel to Farmington, New Mexico, to be at the birth of his child. Though there is a due date of March 29, 2019, the child could viably come at any time in the next several weeks. Mr. Washburn seeks forward-looking permission so that he can quickly travel to Farmington when the time comes.

4. Mr. Washburn will be driven to and from La Pasada Halfway House by his mother. No other conditions of release will be modified.

5. Pretrial Services Officer Anthony Carter does not object to this request.

6. AUSA Allison Jaros does not oppose this motion to modify conditions of release.

WHEREFORE, Mr. Washburn respectfully requests that this Court modify his conditions of release to permit the requested travel.

Respectfully Submitted,

[Electronically Filed]
ALEJANDRO B. FERNANDEZ
Counsel for Mr. Washburn
Federal Public Defender
111 Lomas Blvd. NW, Suite 501
Albuquerque, New Mexico 87102
(505) 346-2489
alejandro_fernandez@fd.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on March 6, 2019, I filed the foregoing electronically through the CM/ECF system, which caused AUSA Allison Jaros to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

[Electronically Filed]